

REMARKS

Applicant requests favorable reconsideration and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-5, 7-9, 13, 14, 16, 17, 19-32, 34-36, 40, 41, 43, 44, and 46-56 are now pending in the application, with Claims 1, 28, 55 and 56 being independent.

Claims 1-3, 5, 13, 28-30, 32, 35, 55, and 56 have been amended. Applicant submits that support for the amendments can be found in the original disclosure, and therefore no new matter has been added.

Claims 1, 2, 4, 5, 7, 13, 14, 16, 17, 19-24, 28, 29, 31, 32, 34, 40, 41, 43, 44, 46-51, 55, and 56 stand rejected under 35.U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,191,808 B1 (Katayama et al. '808). Claims 3, 8, 9, 25-27, 30, 35, 36, and 52-54 stand rejected under 35.U.S.C. §103(a) as being unpatentable over Katayama et al. '808 in view of U.S. Patent No. 5,789,791 (Katayama et al. '791). Applicant respectfully traverses this rejection for the reasons discussed below.

As recited in independent Claim 1, the present invention includes, *inter alia*, the features of inputting an image photographed by second photographing means having a position and orientation that are known, updating detection parameters for detecting a specific point on a target image photographed by first photographing means, based on the image photographed by the second photographing means, detecting the position of the specific point on the target image based on the updated detection parameters, and estimating viewpoint information of the first photographing means using the detected position of the specific point on the target image. Independent Claims 28, 55, and 56 recite similar features. With these features, a specific point necessary for estimating viewpoint

information of the first photographing means can be detected with high accuracy regardless of a change in environment, as discussed for example at page 4, line 13, to page 5, line 3 of the specification.

Applicant submits that the cited art fails to disclose or suggest at least the above-mentioned features. Katayama '808 discloses reconstructing an image viewed from a desired viewpoint based on a multi-viewpoints image database 3 that registers images photographed from a plurality of viewpoints. However, that patent does not disclose or suggest at least the above-mentioned features. The Examiner asserts that the viewpoint detector 2 (Fig. 1) of Katayama '808 corresponds to the updating means of Claim 1, and that the detecting means of Claim 1 is described at column 2, lines 9-18 of Katayama '808. Applicant respectfully disagrees. Katayama '808 states that viewpoint detector 2 detects a position of a user's eye watching a display screen (col. 4, lines 46-47) and does not disclose the claimed updating means, and at col. 2, lines 9-18 that patent describes a structure that reconstructs an image viewed from a desired viewpoint using images obtained by photographing from a plurality of viewpoints, but does not disclose or suggest the claimed detecting means of Claim 1.

Katayama '791 also fails to disclose or suggest at least the above-mentioned features.

Accordingly, Applicant submits that the present invention recited in Claim 1 is patentable over the cited art. The present invention recited in independent Claims 28, 55, and 56 is patentable for similar reasons. The independent claims are patentable for at least the same reasons as their respective independent claims, as well as for the additional features they recite.

In view of the foregoing, Applicant submits that the present application is in condition for allowance. Favorable reconsideration, withdrawal of the outstanding rejections, and an early Notice of Allowance are requested.

Applicant's undersigned attorney may be reached in our Washington, DC office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'B. L. Klock', written over a horizontal line.

Attorney for Applicant

Brian L. Klock

Registration No. 36,570

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
BLK/

DC_MAIN 196282v1